

## SREC II Webinar - Feb. 12, 2014

### Q & A

Q: 1. For 2014 Is the SREC 2 obligation on the competitive retailer side a part of the existing 0.9481% obligation or in addition to it?

A: The SREC II obligation is separate and is in addition to the SREC I obligation.

Q: 2. Along similar lines, if a competitive retail supplier does not procure the enough SREC 1 RECs, can the supplier submit SREC 2s in place of the SREC 1 obligation or vice versa?

No. SREC I certificates and SREC II certificates are entirely different types of certificates and cannot be interchangeably used between the two markets.

Q: You mentioned that GC will help with solar PV installations on landfills.

Can you tell me what role you might play and how you can help a town with possible solar PV installation on landfills?

A: The Green Communities division provides assistance to municipalities interested in pursuing solar projects on closed landfills in various ways. On our web site, you will find a guide to installing solar energy on closed landfills, other solar energy information such as a model solar bylaw, and - most importantly - contact information for the Division's four regional coordinators who can help municipalities navigate the solar energy procurement, permitting, and installation process on a case by case basis. The Division also periodically offers owner's agent technical assistance grants which can be used by cities and towns to hire technical experts to help with municipal energy projects. Past rounds have allowed use for help with municipal solar installations.

Q: Is there any reason we would offer our SRECs at anything below \$285?

A: The auction is meant to be a price support mechanism; it is not a hard price floor. Depending on market conditions, SRECs may or may not be valued at more or less than the \$285 value received when SRECs sell in the auction.

Q: is that \$285 per year for 10 years or a 1 time payment?

A: SRECs are sold annually for a period of 10 years. The auction is also held annually.

Q: what is start date of SREC 2?

A: SREC II officially starts when the regulations have been promulgated: two weeks after they are filed with the Secretary of State's office. At this point in time, it appears likely that this will be April 25, 2014.

Q: Is one goal to lower ghg emissions from electric sector? If so how are these reductions calculated?

A: Lowering GHG emissions and other environmental benefits is a goal of the program, but it is not measured and tracked the way other programs, such as the Regional Green House Gas Initiative (RGGI), might do.

Q: Is the "end" of projects to qualify for SREC I Jun 30, 2014?

A: June 30 2014 is the deadline for projects over 100kW to submit all of their forms and show they are interconnected to the grid. These projects had to have a signed Interconnection service agreement by June 7, 2013 and had to be at least 50% constructed by December 31, 2013.

Projects under 100kW that are still qualifying for SREC I must be interconnected by the date of SREC II promulgation in order to qualify. This will likely be April 25, 2014.

Q: In order for a system that is less than 100kW to be part of SREC I it must be interconnected and operating by the start of SREC II. What is your definition of Interconnected and Operating? Must the system have a final approval to interconnect or just approval to install?

A: They must have a final approval to interconnect issued by their local distribution company.

Q: Why do you support third party ownership for solar PV when the terms are so poor for the host customer?

A: DOER supports the expansion of the solar market in the state, regardless of ownership models. Third party ownership is a way to make solar installations financially feasible for many individuals, business, non-profits, and public entities. It is up to individual consumers to make a choice relating to whether or not they want to own a PV system themselves.

Q: Who gets the difference between the ACP value and the multiplier value delivered to the SREC holder?

A: It's not entirely clear what you're asking here as there is no money to be delivered to anyone. If an SREC is being submitted for compliance by a retail electric supplier, then no ACP will be paid. If retail electric suppliers are paying ACP because they do not have enough SRECs for compliance, then the ACP is paid to an account held by the MassCEC. These funds are then used by DOER to further the development of clean energy.

Q: when will annual Capacity blocks be published?

A: The capacity blocks for the managed growth market for 2014 and 2015 are in the draft regulation. They are 26 MW and 80 MW respectively. For future years, they will be announced no later than August 30 of each year, beginning in 2014.

Q: What will you need to "lock in" your portion of the market sector you are in under the Annual Capacity Blocks? Meaning how far do I need to be in the project to get a piece of the Annual Capacity Block?

A: In order to qualify in advance of interconnecting to the grid, projects must provide DOER with the following:

1. A Statement of Qualification Application
2. A copy of the project's executed Interconnection Services Agreement
3. Proof of site control
4. Copies of all required non-ministerial permits (does not include building & electrical permits)

Q: community shared solar of any size qualify for factor A?

A: Yes.

Q: For Market Sectors/SREC Factors, is kW in AC or DC values?

A: DC

Q: For Market sector A, does the  $\leq 25$  kW cap apply to all the project types (residential, parking canopy, etc)?

A: Yes, but the other qualifying projects in Market Sector A have no size restrictions. So Market Sector A is all projects under 25 kW; all Parking Canopies of any size, Emergency Power Generation Units of any size, Community Shared Solar Generation Units of any size, and low income housing projects of any size.

Q: what if community shared solar is on a landfill?

A: It would be considered a Community Shared Solar Generation Unit as this would represent the highest SREC Factor it could receive.

Q: Has there been a study to determine whether the contents of landfills are more valuable than the solar systems placed on the surface? Why are municipalities with no public landfills or with landfills already converted to open public areas be subject to the lowest SREC 2 value?

A: As far as DOER is aware, there has been no such study undertaken. Even if there are no landfills in a municipality, projects they build are not necessarily relegated to the Managed Growth sector. It all depends on the kind of project they build.

Q: Where would ground mounted solar serving a local municipal light plant's load, larger than 500kW's fit?

A: If it less than 650 kW DC, it would be in Market Sector C. Otherwise it would fall under Managed Growth.

Q: For sector C, could you clarify whether it is all landfills and brownfields and then other sites less than or equal to 500 kWh, or whether the landfill and brownfield sites must also be less than or equal to 500 kWh?

A: It is all landfill and brownfield projects that meet the definitions for each in our regulation. It also includes other non-landfill and non-brownfield sites less than or equal to 650kW DC if less than 67 percent of the power is used on site (this capacity threshold was updated from 500 kW DC following DOER's review of public comments on the initial draft regulation).

Q: Should Market Sector C indicate projects  $\geq 500$  kW?

A: Market Sector C is all landfill and brownfield projects as defined in the regulation, regardless of size, as well as projects less than or equal to 650 kW DC if less than 67 percent of the power is used on site.

Q: If the goal is 1600 MW by 2020, why does the graph of the four categories show only 1400 MW by 2021?

A: This graphic was for illustrative purposes only and was intended to show a rough breakdown of projects by market sector under SREC II. It did not include projects under the SREC I program, which currently amount to just over 400 MW.

It also showed the SREC II program reaching 1,200 MW by 2021, which roughly reflects the maximum possible size of the SREC II program (it will likely end up being much smaller than this depending on how many MW end up in SREC I).

Q: When defining projects that are providing energy "onsite," does this energy have to be used behind a specific meter or are you including projects that use virtual net metering but are within the same property lines?

A: It has to be used behind the meter on the site where the system is installed.

Q: When will caps be increased?

A: If this is in regards to net metering caps, there are currently two bills filed at the legislature. DOER is following what is happening, but is not directly involved. That is up to the legislature.

Q: What is "net metering"?

A: Net metering allows customers of certain electric distribution to generate their own electricity in order to offset their electricity usage. All customer classes are eligible for net metering. Common examples of net metering installations include solar panels on a home or a wind turbine at a school. These installations are connected to a meter, which will measure the net quantity of electricity that the customer uses ("retail meter"). The retail meter spins forward when the customer uses electricity from the distribution company, and it spins backward when the customer generates excess electricity (thereby "exporting" electricity to the electric grid). A special retail meter (also called the "net meter") is required to allow for the "netting" of usage and generation, especially when there may be exporting of electricity. For more information, see the following:

<http://www.mass.gov/eea/grants-and-tech-assistance/guidance-technical-assistance/agencies-and-divisions/dpu/dpu-divisions/legal-division/dpu-and-green-communities-act/net-metering/net-metering.html>

Q: Did you read the Globe today? Will the DOER comment on the article's merits?

A: DOER has no comment on the article in question at this time.

Q: Given the acknowledged threat to Mass. & the environment by climate change, why would DOER NOT take a stand on the issue of Net Metering?? The continued obstruction by regulated IOU's is a significant road block to renewable development. We are out of time to act; we need DOER to bring our voice into this debate!

A: Net metering is managed by the Department of Public Utilities, and all changes have to be made through the legislature. At the moment, it is a legislative issue and while DOER is monitoring it and can provide guidance and input upon request, we cannot directly make changes to the rules.

Q: What percentage of MA consumption is represented by solar program?

A: When the 1,600 MW statewide goal is reached, it is expected that solar will account for somewhere between 3 and 4 percent of all statewide electric load.

Q: IS historic installation data available to the public? Is there a database where this information is housed?

A: DOER maintains a list of all projects qualified under the SREC program that is updated monthly. This list can be found on the following page:

<http://www.mass.gov/eea/energy-utilities-clean-tech/renewable-energy/rps-aps/qualified-generation-units.html><http://www.mass.gov/eea/energy-utilities-clean-tech/renewable-energy/rps-aps/qualified-generation-units.html>

Q: I had a question regarding the timeline. Mike could you go a little more in depth on the steps before final implementation of SREC II?

A: The Committee on Telecommunications, Utilities, and Energy sent their comments on the February 11, 2014 draft of the regulation to DOER on March 10<sup>th</sup>. At this point, DOER has a minimum of 30 days in which we must consider changes to the regulation based on the comments received and gain the necessary approval to file from the Secretary of the Executive Office of Energy and Environmental Affairs and the Governor. Once these steps have occurred, DOER may then file the final regulation with the Secretary of State's office. The regulation will then be promulgated two weeks later according to the schedule on the Secretary of State's website.

Q: The Net Metering Cap is critical for our town to complete an agreement with the solar developer on our landfill. How can we make sure that this system continues?

A: Any changes to the state's net metering rules would need to be made by the legislature. As such, expressions of support would be best made to members of the House and Senate.

Q: What is the status of the Culter Bill?

A: Are you referring to the Calter Bill (H.2195)? If so, DOER is not sure what the status of this particular bill is at this time.

Q: A Town on the Cape installed a PV array at their WWTP. All the power could go to the plant and it was initially designed that way. However the electric utility required the interconnection at a separate new service. Under SREC II would this project be able to get into the 0.7 group or the managed growth?

A: Depending on the size of the system and whether or not it was building or ground mounted, it could fall into any one of the market sectors. That being said, if it is a ground mounted project that is larger than 650 kW DC and is not providing 67 percent or more of its output to an on-site load (i.e., more than one third of its output is virtually net metered), it would fall into the Managed Growth market sector.

Q: Are there resources available to help towns develop RFP's for net metering?

A: The Green Communities Division does not have a program specifically for that purpose, but it is possible that future rounds of owner's agent technical assistance could include funding this sort of expertise; each grant round comes with its own set of criteria. The Division is also in the process of reviewing proposals from more than 30 cities and towns for energy manager grants, which would allow municipalities to hire their own in-house expertise to assist with a wide array of municipal energy projects.

Q: I know of a senior housing facility with 88 units and lots of roof capacity. They spend about \$15,000 per month on electricity. How would they go about getting solar panels?

A: It depends on their particular circumstances, but they could either install it on the roof or next to the building, or participate in a virtual net metering arrangement in which they purchase net metering credits from a project installed at a different location. The first step that DOER would recommend them taking would be to contact a few installation companies.

Q: To allow us to properly disclose information to our clients what do you project as the launch date of SREC II?

A: At this point, it will likely be April 25, but that is not guaranteed.

Q: Will utility companies be required to track load considerations (the 67 percent threshold) for the SREC program? Or will MassCEC be responsible for verifying this information?

A: DOER will determine whether or not a project meets this threshold by either collecting historical electric bills or obtaining an estimate from a P.E. in the event that the building is new construction.

Q: is the DOER or DEP planning to offer indemnification toward developer who is planning to build on landfills owned by the town?

A: No

Q: what are the biggest pros and cons of net metering to someone considering it for the first time?

A: It depends on exactly what you're trying to do. Net metering allows customers of certain electric distribution to generate their own electricity in order to offset their electricity usage. All customer classes are eligible for net metering. Common examples of net metering installations include solar panels on a home or a wind turbine at a school. These installations are connected to a meter, which will measure the net quantity of electricity that the customer uses ("retail meter"). The retail meter spins forward when the customer uses electricity from the distribution company, and it spins backward when the customer generates excess electricity (thereby "exporting" electricity to the electric grid). A special retail meter (also called the "net meter") is required to allow for the "netting" of usage and generation, especially when there may be exporting of electricity. For more information, see the following:

<http://www.mass.gov/eea/grants-and-tech-assistance/guidance-technical-assistance/agencies-and-divisions/dpu/dpu-divisions/legal-division/dpu-and-green-communities-act/net-metering/net-metering.html>

Q: DO you see CAP for NMCs exceeding 10 MW for State agencies in the future?

A: DOER has no insight into changes that may potentially be made to net metering. Any changes to the state's net metering rules would need to be made by the legislature.

Q: is there a dashboard type tool a community can use to track solar, wind, energy reduction, and recycling rates?

A: The Green Communities Division created an online municipal energy consumption tracking tool called MassEnergyInsight (MEI) (<http://www.mass.gov/eea/energy-utilities-clean-tech/green-communities/massenergyinsight.html>), which allows

municipalities to see which of their buildings and facilities are using the most energy in order to help target energy saving measures. The system includes tracking renewable energy production, but not recycling rates. MEI is offered free of charge to all Massachusetts cities and towns and other public entities.

Q: How long company will have to build the project once SREC approval is received under new design?

A: These timelines will be established in the Assurance of Qualification Guideline, which was recently released by DOER for public comment.

Q: Is there an estimate of SREC pricing for SREC I versus SREC II when SREC II is first introduced?

A: DOER does not provide pricing forecasts, but would direct you to the Auction and ACP Rate schedules outlined in the regulation. These can then be compared with the \$300/MWh auction price and ACP Rate schedule under SREC I.

Q: Could you please describe the qualification/queuing process for securing a project's participation in the Managed Growth sector?

A: The process is described in greater detail in the Assurance of Qualification Guideline, which was recently released for public comment. It can be found on our website here:

<http://www.mass.gov/eea/energy-utilities-clean-tech/renewable-energy/rps-aps/regulatory-proceedings-for-rps-and-aps.html>

Q: how is watershed property classified to be utilized by solar install?

A: It depends on the size and type of the project being installed.

Q: Is there a plan to introduce thermal RECs in the future?

A: There is a bill currently pending in the legislature (S.1593) that proposes to include useful thermal energy using sunlight, biomass, bio-gas, liquid bio-fuel or naturally occurring temperature differences in ground, air or water as eligible technologies under the state's Alternative Portfolio Standard.

Q: What is history of auction in 2012 and 2013, pricing and # SRECs sold?

A: There was no auction held in 2012. The auction held in July/August of 2013 was for SRECs originally generated in 2012. Of the 38,866 SRECs deposited into the auction, three were purchased. More details can be found on the following page of DOER's website:

<http://www.mass.gov/eea/energy-utilities-clean-tech/renewable-energy/solar/rps-solar-carve-out/solar-credit-clearinghouse-auction.html>

Q: does a brownfield site larger than 500 kw qualify as market sector C?

A: Yes

Q: does the utility approval final letter set the date for approval or acknowledgement from you?

A: The date that a facility receives the authorization to interconnect is used by DOER to establish the RPS Effective Date, the date on which a facility can begin generating RECs/SRECs.

Q: How much ACP was collected from LSEs in 2013 and how is expected in 2014 and 2015?

A: The 2013 trading year is still underway and will not conclude until June 15<sup>th</sup>. DOER will not know the quantity of ACP payments that will be made until sometime in July at the very earliest. We have no official projects on ACP volume expected for 2014 or 2015.

Q: Why are parking lot canopies favored in category A?

A: For two primary reasons:

1. Parking canopies generally cost significantly more on a \$/watt basis than other types of installations.
2. To encourage the development of solar PV on paved or other parking surfaces before the development on open space.

Q: Does DOER and/or DPU have any leverage to encourage/force the utilities to streamline (and speed up) their interconnection processes?

A: Any changes to the interconnection tariff would need to be directed by the legislature or be taken up by the DPU.

Q: Are non-profits under 15 kW considered in Market Sector A with residential, as in Solarize program? Is there a minimum SREC value for 2014 in the proposed SREC II?

A: If a project is sized less than 25 kW DC, it will fall under Market Sector A. The Auction price for 2014 is \$300, though this is not a guaranteed minimum price.

Q: Once the SREC-II regulations have been promulgated (e.g. April 2014), is it correct that all existing retail electricity contracts prior to the effective date will be exempt from the new compliance obligation?

A: Yes

Q: adding capacity to existing residential srec 1 system, how is it dovetailed?

A: Incremental capacity installed at the site of an SREC I or other non-SREC II eligible system must have a separate production meter to measure its output independently of the original system(s).

Q: What limitations on net metering for community shared solar?

A: This question is somewhat unclear. As far as DOER is concerned, the state's virtual net metering rules allow for a number of different options when designing a community shared solar project.

Q: You stated that all permits must be in place. Does this include the EPA CGP?

A: If that is non-ministerial permit required to build the facility, then yes.

Q: Will the actual "currency" of SRECs from both programs be the same / interchangeable?

A: No. SRECs and SREC IIs are two entirely different types of attributes with different market values.

Q: Does a project that is already in the SREC 1 system of assurance and has until June 30th to be operational can it lose its SREC1 status if SREC2 goes into effect prior to June 30th?

A: No.

Q: Please clarify what you mean by on-site load if the owner owns many electric accounts (e.g. a municipality).

A: The utility account/meter that the system is tied into,

Q: what is the definition of community shared solar?

The current definition from the draft regulation is as follows:

Community Shared Solar Generation Unit. A solar photovoltaic Generation Unit that provides net metering credits to three or more utility accounts, whose participants have an interest in the production of the Generation Unit or the entity that owns the Generation Unit, in the form of formal ownership, a lease agreement, or a net metering contract. No more than two participants may receive net metering credits in excess of those produced annually by 25 kW of nameplate DC capacity, and the combined share of said participants' capacity shall not exceed 50 percent of the total capacity of the Generation Unit.

Q: Would protected water district property be considered like a brownfield site? This land has very limited re-use because of public health and safety concerns.

A: Only if the site fits the definition of Brownfield in the regulation.

Q: what sector is 100 - 200 kW commercial system in, serving a load; and less than 100 kW?

A: It would depend on whether or not the system was building or ground mounted, and, if ground mounted, what percentage of the system's total output went to serving an on-site load. If building mounted, it would fall under Market Sector B. If ground mounted and providing 67 percent or more of its output to an on-site load, it would also qualify under Market Sector B. If less than 67 percent of its output was provided to an on-site load, it would fall under Market Sector C.

Q: What determines the value of a SREC?

A: The price which it can be sold at, which is primarily dictated by the supply/demand balance in a particular trading year.

Q: Do you know the percentage of residential solar that were third party financed - where the homeowner did NOT own the installation - did this drive the offering of the financing you mentioned?

A: Slightly more than 60 percent or so of the residential systems installed in 2013 are third party owned.

Q: Who gets the value difference of a factored SREC2?

A: Production that is not qualified as SREC II eligible (i.e. the 30 percent of production in the case of a Managed Growth Sector project with a 0.7 Factor) generates certificates that are not encoded as RPS eligible. The draft regulation currently requires that these certificates be retired by the generator or NEPOOL GIS.

Q: Do you foresee power companies eventually charging for connecting to their infrastructures and using their infrastructures for net metering?

A: We cannot make a prediction on how utility fee and billing structures may look in the future.

Q: Do you know what they are trading for outside of the auction time?

A: DOER is not privy to the prices that individual SRECs trade at, nor do we have the ability to track transactions. That being said, the market has been oversupplied for the last two trading years and SRECs have generally traded at prices below the auction price during the trading year.

Q: For small installations, is there a provision in SREC II to enable SREC revenue to be paid up front, rather than over time?

A: No. SRECs can only be sold as they are minted in the NEPOOL GIS.

Q: Do the net metering caps affect every project, i.e. residential systems, or only larger systems like commercial or utility scale?

A: Projects 25 kW AC or less using three-phase power or 10 kW AC or less using single-phase power are not subject to the cap. Projects in Municipal Light Districts, and those projects electing not to qualify as a net-metered facility are not subject to the net metering caps. All other projects do fall under the caps.

Q: What happens if the auction fails again, will DOER buy them again?

A: DOER has no plans to purchase SRECs in the auction in the future.

Q: so the competitive electric supplier obligation for 2014 will be 0.9481% SREC 1 AND an additional to be determined SREC 2 percentage?

A: Yes.

Q: Will the SREC II Obligation be adjusted lower in 2014 compared to 2015, due to the program taking effect part-way through the year?

A: Not necessarily. The Compliance Obligation for 2014 has been established as 41,279 MWh in the draft regulation. The Compliance Obligation for 2015 has been established 161,958 MWh. Future compliance obligations (and Minimum Standard percentages) will be announced by no later than August 30<sup>th</sup> each year beginning in 2015.

Q: What qualifies as an "Emergency Power Generation" in Market sector A?

A: The current version of the draft regulation defines Emergency Power Generation Unit as follows:

Emergency Power Generation Unit. A solar photovoltaic Generation Unit installed for the purpose of providing 67 percent or more of its annual electric output to be used on-site as prescribed by 225 CMR 14.09(a) at critical infrastructure that can be utilized in the event of an emergency or power outage. For purposes of this definition, critical infrastructure includes, but is not limited to, the following: hospitals, police and fire stations, airports, emergency management agencies, acute/post-acute medical facilities with life sustaining equipment, water and sewer treatment facilities, pump stations, evacuation centers, and emergency communications centers that serve a life safety function.

Q: please define community shared solar.

A: The current definition from the draft regulation is as follows:

Community Shared Solar Generation Unit. A solar photovoltaic Generation Unit that provides net metering credits to three or more utility accounts, whose participants have an interest in the production of the Generation Unit or the entity that owns the Generation Unit, in the form of formal ownership, a lease agreement, or a net metering contract. No more than two participants may receive net metering credits in excess of those produced annually by 25 kW of nameplate DC capacity, and the combined share of said participants' capacity shall not exceed 50 percent of the total capacity of the Generation Unit.

Q: Are the caps for NMC in AC or DC?

A: DC

Q: Will Aggregators need two separate GIS / PTS accounts?

A: Aggregators with current Aggregations under SREC I will need to qualify a new Aggregation and establish new NEPOOL GIS Account(s) under SREC II.

Q: why is the percentage so small?

A: While solar is the fastest growing generation resource in the state, it is still at a relatively low level of grid penetration.

Q: If there is a shortage in capacity to be allocated in the managed growth sector, how will the projects be awarded.... by priority in the date of interconnect agreement or by date of submittal?

A: The Assurance of Qualification Guideline provides details on how the order of applications will be determined.

Q: will the portion of the projects not eligible under SREC II because of the SREC factor be eligible to generate Class I RECs?

A: No.

Q: Since threshold - size - of investment is one of the largest barriers to entry (in addition to security) for most of the significant banks/financing entities, how does the direct ownership ACP funded support program deal with bundling of projects?

A: The details of the program are still being established, but there will be opportunities for stakeholders to provide input as we move further into the design process.

Q: Can you publish the actual definition of a Brownfield?

A: Brownfield is currently defined in the draft regulation as follows:

Brownfield. A disposal site that has received a release tracking number from MassDEP pursuant to 310 CMR 40.0000, the redevelopment or reuse of which is hindered by the presence of oil or hazardous materials, as determined by the Department, in consultation with MassDEP. For the purposes of this definition, the terms "disposal site," "release tracking number," "oil," and "hazardous materials" shall have the meanings giving to such terms in 310 CMR 40.0006. No disposal site that otherwise meets the requirements of this definition shall be excluded from consideration as a Brownfield because its cleanup is also regulated by the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. §§ 9601-9675, the Resource Conservation and Recovery Act, 42 U.S.C. §§ 6921 - 6939g, or any other federal program.

Q: With my net meeting system I get credit for the Generation value of the electricity. I think this is about one half of the value of the generated electricity if it was used at the system site, as no transmission charge is applied then. So net metered system electricity ends up being much less valuable then if it was consumed at the PV system location?

A: The net metering rules in Massachusetts actually credit qualified facilities for generation, distribution, transmission, and transition charges, meaning that the value of the credit generated is almost exactly equal to the retail rate of electricity. The only exception to this are private net metering facilities sized between 1 and 2 MW, which do not receive the distribution rate in the calculation of their credits.

Q: 2 SREC markets? SREC1 and SREC 2, both with their own obligations for retail suppliers?

A:Yes.

Q: If a solar facility is constructed for onsite load and the off taker goes dark, how are the SRECs calculated? If a building has either a rooftop system or a system is built on vacant land on the property and the power is used by an occupant of the building but the tenant vacates and the building is not occupied for 12 months due to market conditions, how are SRECs calculated and how is power credited?

A: Once a facility is qualified as one that provides 67 percent or more of its output to an on-site load, its SREC factor cannot change based on a reduction in the on-site load.